REMARKS

CLAIMS 1-8 AND 10-12

With the present amendment, the limitation of claim 9 has been added to claim 1. As amended, independent claim 1 provides a speech recognition interface for a speech recognition engine. The interface comprises a compiler that produces a binary grammar from a markup language grammar written in a markup language. The markup language grammar comprises rule tags that delimit a grammar structure that may be referenced by other grammar structures within the markup language grammar by a name attribute of the rule tags. A grammar engine provides the binary grammar to the speech recognition engine.

Claims 1-12 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Brown et al. (U.S. Patent Number 6,587,822, hereinafter Brown) in view of Ladd et al. (U.S. Patent Number 6,470,317, hereinafter Ladd).

As amended, independent claim 1 is not shown or suggested in either Brown or Ladd. In particular, neither reference shows or suggests rule tags that delimit a grammar structure that may be referenced by grammar structures within a markup language grammar by a name attribute of the rule tags. In the Final Office Action of July 12, 2005, column 13, line 25 to column 14, line 64 of Brown was cited as showing rule tags that delimit a grammar structure. However, the cited section makes no mention of rule tags or of rule tags that have a name attribute that can be used to reference the rule within the markup language grammar. In the Advisory Action of September 26, 2005, the "Get Message" value set for the Title parameter in col. 14, was said to be a name attribute of a rule tag. However, it is not found in a rule tag and it cannot be used by another grammar structure in the markup language grammar to reference the grammar structure

defined within the GRAMMAR tags. Instead, the Title parameter appears to be a value that is displayed in the HTML document.

Similarly, Ladd does not show or suggest rule tags that delimit a grammar structure that may be referenced by a name attribute of the rule tags.

By providing rule tags that include a name attribute, the invention of claim 1 provides a simple way to define a grammar so that one grammar structure may use the name in a rule tag to reference another grammar structure. This simplifies the authoring of the overall grammar and provides a final grammar that is easy to read because of the rule tags.

Neither Brown nor Ladd show or suggest a grammar written with such rule tags. As such, claim 1 and claims 2-8 and 10-12, which depend therefrom, are patentable over the combination of Brown and Ladd.

The Advisory Action also stated that claim 1 was in a Jepson type format because it included the word "comprising" twice. Applicants respectfully disagree with this assertion. A Jepson claim requires a phrase such as "wherein the improvement comprises". 37 C.F.R. §1.75(e), MPEP §§ 608.01(m), 2129. Claim 1 does not include such a phrase and as such is not a Jepson claim.

CLAIMS 13, 14 AND 16-29

Claims 13, 14 and 25-29 were rejected under 35 U.S.C. § 103 as being unpatentable over Brown in view of Ladd. Claims 15-24 were rejected under 35 U.S.C. § 103 as being unpatentable over Brown in view of Ladd in further view of Martin (U.S. Patent Number 5,642,519).

With the present amendment, claim 13 has been amended to include the limitations of former claim 15. As amended, claim 13 is directed to a computer readable medium having instructions comprising an application providing a speech interface that

expects to receive speech from the user as possible input. A speech grammar associated with the application is also provided and defines valid word patterns for the user's speech. The speech grammar is written in a markup language such that a start tag and an end tag having a first tag name that delimit a set of elements of the grammar are located between a second start tag and a second end tag that have a second tag name. The speech grammar comprises rule tags that delimit a valid grammar structure for the grammar and that comprise a name attribute that is set equal to a name by which the grammar structure can be referenced by within the grammar.

As amended, claim 13 is not shown by the combination of Brown, Ladd and Martin. In the Final Office Action, it was asserted that Martin showed such rule tags at column 18, lines 10-20. However, the cited section makes no reference to rule tags that delimit a grammar structure. Although Martin uses the word "tag" with reference to a rule name, the "tag" does not delimit a grammar structure. Instead, the tag is a rule identifier that is found in the first part of the rule. In fact the "tag" in Martin forms part of the rule name. Thus, Martin does not show rule tags that delimit a grammar structure as found in claim 13. Similarly, Brown and Ladd do not show rule tags that delimit a grammar structure.

Since none of the three references show rule tags that delimit a grammar structure and that have a name attribute that can be used to reference the grammar structure within the grammar, the combination of these three references does not show or suggest the invention of claim 13 or claims 14, and 16-29, which depend therefrom.

In the Advisory Action, claim 13 was said to be in Jepson format. However, claim 13 does not include a phrase such as "wherein the improvement comprises", which is required to form a Jepson claim. As such, claim 13 is not a Jepson claim.

CLAIMS 30-43

Claims 30-43 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Brown in view of Ladd.

Independent claim 30 is directed to a method of defining a grammar for speech recognition. The method includes delimiting a grammar structure with rule tags that conform to a markup language. The method further includes delimiting all of the rule tags for the grammar with grammar tags that conform to a markup language.

Neither Brown nor Ladd show or suggest delimiting a grammar structure with rule tags that conform to a markup language and then delimiting all the rule tags for the grammar with grammar tags that conform to a markup language. Although Brown does show a grammar defined within grammar tags, it does not show rule tags that conform to a markup language. Similarly, Ladd does not show rule tags that conform to a markup language.

Since neither Brown nor Ladd show or suggest delimiting a grammar structure with rule tags that conform to a markup language or delimiting all the rule tags for a grammar with grammar tags that conform to a markup language, the combination of Brown and Ladd does not show or suggest the invention of claims 30-43.

CONCLUSION

In light of the above remarks, claims 1-8, 10-14, and 16-43 are patentable over the cited art. Reconsideration and allowance of the claims is respectfully requested.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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